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**Redacted – For Public Inspection**

March 24, 2000

**Ex Parte Submission**

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RECEIVED  
MAR 24 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the  
Telecommunications Act of 1996 to Provide In-Region, InterLATA  
Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Enclosed for filing under seal please find confidential and redacted versions of an analysis disproving claims, made particularly by AT&T, that the three-order process used by Southwestern Bell Telephone Company to process UNE Platform conversions leads to loss of dialtone in a significant number of instances. This information further confirms Southwestern Bell's previously stated position that the three-order process, which was developed in accordance with Texas PUC requirements, results in efficient, reliable service conversions. See Southwestern Bell Reply Br. at 52-55. A portion of this material is redacted to protect confidential information relating to AT&T's operations in Texas.

An original and two copies of this cover letter are being submitted for inclusion in the public record. Please let me know if you have any questions about this matter.

Sincerely,



Austin C. Schlick

No. of Copies rec'd 0+2  
List ABCDE

cc: Mr. Jennings  
Mr. Stanley  
Ms. Stephens  
Ms. Wright  
Ms. Farroba, Texas PUC  
Ms. Heisler, DOJ  
ITS

## **UNEP Conversion**

### **Summary:**

CLECs alleged that the three-order process used by SWBT to convert customers from SWBT to CLEC UNE Switch Port (UNEP) causes loss of dial tone for a large percentage of their end-users on the due date.

### **Trouble Report Origination - CLECs:**

CLECs can report trouble to SWBT's Local Operations Center (LOC) on or after their service order due date. This process was explained and distributed to the CLECs in Accessible Letters dated November 5, 1999 and again on February 18, 2000 (both are attached). These letters describe clearly the trouble reporting guidelines for CLECs submitting trouble reports to the LOC on or after the scheduled service order due date. The November 5, 1999 Accessible Letter explains how to report trouble on the due date to a Customer Service Representative (CSR) in the LOC, and the February 18, 2000 explains how to report trouble using ToolBar on the due date.

### **UNEP Conversion Issue Analysis**

The conversion process was reviewed to compare results on Performance Measure 35-12 (Percent Trouble Report Within 10 Days of Install – No Field Work – C (Change) Orders). There was no significant difference between SWBT and all CLECs from August 1999 through January 2000 (only 0.42% difference). SWBT analyzed 12,650 C orders with no field work for one CLEC in Texas for December and 11,050 C orders for January. SWBT discovered only 87 (0.7%) of the orders resulted in loss of dialtone for December and only 92 (0.8%) for January. There were only 6 (0.05%) trouble reports on the completion date in December and only 8 (0.07%) orders in January.

### **Service Order – Report Validation**

SWBT randomly selected and reviewed 300 UNE-P Conversion service orders for two CLECs in Texas. The RAND function in Excel was used to randomly select service orders. RAND returns an evenly distributed random number greater than or equal to 0 and less than 1. These numbers were assigned to each number in the base. The file was then sorted (ascending) and  $n$  orders were selected from row 1 to row  $n$  ( $n$  = the sample size). This review was done to determine if the CLEC end user might have reported trouble to SWBT's Customer Service Bureau (CSB) on the service order completion date. For CLEC-A, 100 orders were selected from a base 13,248 orders completed in January and 100 orders of 19,864 from February. For CLEC-B, 50 orders of 7,085 were selected from January and 50 orders of 10,767 from February. After reviewing the trouble history files for all 300 UNE-P conversions, no trouble reports were found to be reported by the CLEC end user to the CSB on the completion date.

# Accessible



## **SOUTHWESTERN BELL - LOC Acceptance of Trouble Reports On or After Service Order Due Date**

Date: November 5, 1999

Number: CLECSS99-151

Contact: Southwestern Bell Account Manager

This letter announces the CLEC Handbook update on the SWBT LOC (Local Operations Center) acceptance of trouble reports received on or after the service order due date. The documentation provides trouble reporting guidelines for CLECs submitting trouble reports to the LOC on or after the scheduled service order due date.

This documentation is available on the CLEC web site at <https://clec.sbc.com>.

- Select "Customer Handbook"
- Select "A State"
- Expand "Repair Section"
- Expand "Maintenance and Repair"
- Select "LOC Acceptance of Trouble Reports On or After Service Order Due Date"

A copy of the documentation contained in the CLEC Handbook at the above location also is attached for your review.

Please direct any questions to your Account Manager.

Attachment

# Category: Repair

## 1.0 Maintenance & Repair

### 1.4 LOC Acceptance Of Trouble Reports On Or After Service Order Due Date

The SWBT LOC accepts service effecting Trouble Reports from the CLEC **on or after** the scheduled Service Order Due Date, under the following conditions:

- Orders related to Unbundled Network Element (UNE) and UNE Switch Ports (UNEP), and service effecting problems associated with these orders, are accepted by the LOC on and after the Due Date. The LOC is open 24 hours-a-day, seven days-a-week.
- All Non-UNEP Orders are normally provisioned by SWBT between 8:00 a.m. and 5:00 p.m. (CST). The LOC accepts service effecting reports after 5:00 p.m. (CST) on the due date of Non-UNEP orders.

**Important:** Prior to 5:00 p.m. on the Due Date, the CLEC should contact the SWBT Local Service Center (LSC) to report trouble on Non-UNEP orders.

- The LOC accepts a service effecting trouble report (on or after the due date) on both UNEP and non-UNEP service if the CLEC is inhibited from utilizing Toolbar – Trouble Administration (Toolbar-TA) or Electronic Bonding (EB) due to problems associated with the service order posting to completion.

**Note:** This guideline does not apply to conversions of the CLEC's Resold Accounts to UNEP. These types of reports can normally be entered via Toolbar – TA or EB.

To report trouble manually, contact the Local Operations Center (LOC) at **1-800-220-4818**.

Here is a list of topics related to service orders:

- Add, alter or change service and/or features
- Inquires relative to rates and charges
- Billing information and/or end user address
- Due date changes or expedites
- Add, alter or change of porting arrangements
- Add, alter or change of access arrangements
- Cancellation of the order
- Pending order inquires

The CLEC must direct questions about any of these topics to the LSC (not to the LOC) **prior to 5:00 P.M. (CST)**. The:

- **Business LSC** can be reached at **1-888-599-0278**
- **Residence LSC** can be reached at **1-800-241-0268**

# Accessible



## **SOUTHWESTERN BELL – Initial Requirements for March 18<sup>th</sup> Toolbar Trouble Administration Release**

Date: February 18, 2000

Number: **CLECSS00-018**

Contact: Southwestern Bell Account Manager

This Accessible Letter provides the Initial Requirements for the next scheduled Toolbar Trouble Administration release, version 5.1.2. This mandatory release will become available for downloading at 12:01 am (CDT) on Saturday, March 18, 2000.

The following functionality changes are being made:

- Trouble Administration is being enhanced to provide the ability to create trouble reports on or after the service order Due Date. A verification message will be returned when an inquiry is submitted for a telephone number formatted circuit (for UNE-P and Resale) not matching the CLEC user profile. The verification message will read:

### **OUR RECORDS INDICATE THIS TELEPHONE NUMBER IS NOT PART OF YOUR USER PROFILE**

The Attachment provides a detailed clarification of the enhancements included in this release. An updated version of the Trouble Administration User Guide will be available through your Account Manager or under Job Aids on the IS Call Center location of the CLEC web site on <https://clec.sbc.com> by March 15, 2000.

Per the Change Management Process, CLECs may provide comments on these Initial Requirements to their Account Managers through Thursday, February 24<sup>th</sup>.

Attachment

**Enhancements for Trouble Administration Version 5.1.2**  
**Available at 12:01 am on Saturday, March 18, 2000**  
**Mandatory Release**

**OUR RECORDS INDICATE THIS TELEPHONE NUMBER IS NOT PART OF YOUR USER PROFILE**

Trouble Administration is being enhanced to provide the ability to create trouble reports on or after the service order Due Date. This enhancement is a Southwestern Bell process upgrades and will not require any additional input on any of the Trouble Administration application screens.

In the current process of reporting trouble using the Toolbar Trouble Administration (TB/TA) application, a trouble report can not be taken until the service order has posted. This is because the service order will not update to the repair and maintenance databases until it has posted in the CRIS or CABS billing system. With this enhancement, TB/TA will allow the CLEC user to enter service affecting trouble reports on telephone number formatted services (for Resale and UNE-P) associated with recent service order activities either in pending or completion status.

Under the new process, a verification message will be returned when an inquiry is submitted for a telephone number formatted circuit not matching the CLEC user profile. This new verification response will be:

**"Our Records indicate this Telephone Number is not part of your User Profile, do you wish to continue? "**

Upon receipt of this response, the CLEC will be given two options. The CLEC may either enter:

- "YES" - continue in creating a mechanized trouble report on a telephone number not matching the CLEC user profile; or
- "NO" - cancel the transaction

The normal functionalities (i.e.; Trouble History, Trouble Ticket Status, MLT Test) currently available for trouble reports entered in Trouble Administration will also be provided on trouble reports entered under the new enhancement.





## **AT&T UNE-P Conversions**

Analysis of AT&T's UNE-P conversion orders and trouble reports (which is provided below) demonstrates that **only 0.7% of AT&T's UNE-P conversions in December 1999 and 0.8% in January 2000 resulted in loss of dialtone**. This extremely low percentage of lost dialtone during AT&T's UNE-P conversions conclusively disproves the allegation that address problems and/or the 3-order process results in a widespread loss of service. Moreover, if a significant loss of service were occurring, it would be expected that AT&T would report this problem to SWBT on or shortly after the day that service was scheduled to be provided. However, only a very small fraction of the trouble reports for AT&T's UNE-P conversions were reported within the first three days of service completion.

### **Analysis:**

To assess the actual magnitude of the problem alleged by CLECs, SBC first examined the results for Performance Measurement ("PM") 35-12 in Texas. PM 35-12 measures the percentage of C ("change") orders with no field work that receive a trouble report within 10 calendar days of service order completion. The difference between the trouble report rate for all CLECs and for SWBT retail from August 1999 through January 2000 averages a mere 0.42%, indicating no competitively significant problem with processing CLEC UNE-P orders.

SBC also examined the performance results on PM 35-12 in the months of December 1999 and January 2000 specifically for AT&T, the largest UNE-P provider in Texas. The results of that analysis are as follows:

#### **December 1999**

- AT&T had \*\*\*\* C orders with no field work.
- AT&T had \*\*\*\* trouble reports on these C orders, for a trouble report rate of only 1.32%.
- \*\*\*\* of these trouble reports reported no dialtone.
- **Hence, only 0.7% of AT&T's C orders in December 1999 resulted in a loss of dialtone.**
- SWBT's root cause analysis found that only \*\*\*\* trouble reports, or 0.3%, resulted from conversion activity.

- The number of trouble reports on C orders reported by AT&T within 3 days of service order completion was:

Day 0 – \*\*\*\* (0.05%)  
 Day 1 – \*\*\*\* (0.2%)  
 Day 2 – \*\*\*\* (0.1%)  
 Day 3 – \*\*\*\* (0.2%)

- AT&T's 1.32% trouble report rate in December compared to SWBT's retail rate of 1.20%.

#### January 2000

- AT&T had \*\*\*\* C orders with no field work.
- AT&T had \*\*\*\* trouble reports on these C orders, for a trouble report rate of only 1.77%.
- \*\*\*\* of these trouble reports reported no dialtone.
- **Hence, only 0.8% of AT&T's C orders in January 2000 resulted in a loss of dialtone.**
- SWBT's root cause analysis found that only \*\*\*\* trouble reports, or 0.3%, resulted from conversion activity.
- The number of trouble reports on C orders reported by AT&T within 3 days of service order completion was:

Day 0 – \*\*\*\* (0.07%)  
 Day 1 – \*\*\*\* (0.2%)  
 Day 2 – \*\*\*\* (0.2%)  
 Day 3 – \*\*\*\* (0.2%)

- AT&T's trouble report rate of 1.77% in January compared to SWBT's retail rate of 1.16%.